

August 4, 2016

Ms. Amelia Piggott
Enforcement Attorney
U.S. Environmental Protection Agency
Region 8
1595 Wynkoop Street
Denver, Colorado 80202-1129

Re: Uintah Mining District Site

Dear Ms. Piggott:

On behalf of VR CPC Holdings, Inc. ("VR"), in response to EPA's letter dated July 26, 2016, I am writing to let you know that VR disputes EPA's authority to file a lien on VR's leased property in Park City, Utah that is subject to EPA's removal action. Accordingly, VR requests a meeting with a neutral EPA official to present information showing that EPA does not have a reasonable basis on which to file the lien. That information includes, but is not limited to, the analysis of VR's lease under the *Commander Oil* case that I presented to you orally on Friday, July 22, 2016. VR will provide a written submission setting forth its basis for contesting EPA's authority to file the lien prior to any meeting with the neutral EPA official.

In addition, in response to your offer, VR requests an informal meeting with EPA staff prior to the meeting with the EPA neutral official. Please let me know dates and times that EPA is available to meet to discuss this issue.

Finally, as we discussed this morning, VR requests a thirty-day extension to respond to EPA's information request, such that its response would be due on Monday, September 26, 2016.

Thank you for your consideration.

Sincerely,



Scott H. Reisch

Partner